

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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EDGEWOOD HIGH SCHOOL  
OF THE SACRED HEART, INC.,

Plaintiff,

v.

Case No. 3:21-CV-118

CITY OF MADISON, WISCONSIN;  
CITY OF MADISON ZONING BOARD  
OF APPEALS; CITY OF MADISON  
PLAN COMMISSION; and CITY OF  
MADISON COMMON COUNCIL,

Defendants.

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**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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TO: All Parties of Record (via CM/ECF)

PLEASE TAKE NOTICE that defendants the City of Madison, City of Madison Zoning Board of Appeals, City of Madison Plan Commission and City of Madison Common Council, by their attorneys, Boardman & Clark LLP, hereby move the Court, the Honorable William M. Conley presiding, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, dismissing with prejudice all of plaintiff's claims against them. The motion is based on the file in this case and is supported by the declarations, the brief, and the proposed findings of fact that accompany it.

Dated this 20<sup>th</sup> day of May, 2022.

Respectfully submitted,

/s/ Sarah A. Zylstra

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